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**From:** Housenger, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F6C33AA2BE564C5EB416B98B5135B448-HOUSENGER, JUSTIN]  
**Sent:** 6/2/2021 5:09:22 PM  
**To:** Sappington, Keith [Sappington.Keith@epa.gov]  
**Subject:** RE: Neonics Treated Seeds Topic: 6/8 Full SFIREG Mtg

Hi Keith,

Let's talk at 2 about this. I'm sure you noticed only some of those bullets relate to their overall bottom line question.

Justin

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**From:** Sappington, Keith <Sappington.Keith@epa.gov>  
**Sent:** Wednesday, June 2, 2021 10:15 AM  
**To:** Housenger, Justin <Housenger.Justin@epa.gov>  
**Subject:** FW: Neonics Treated Seeds Topic: 6/8 Full SFIREG Mtg

Just keeping you in the loop. Looks like it has not been decided if/who would deal with this @ SFIREG.

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**From:** O'Neill, Sandra <O'Neill.Sandra@epa.gov>  
**Sent:** Tuesday, June 1, 2021 9:12 PM  
**To:** Steeger, Thomas <Steeger.Thomas@epa.gov>  
**Cc:** Holmes, Jean <Holmes.Jean@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>  
**Subject:** RE: Neonics Treated Seeds Topic: 6/8 Full SFIREG Mtg

Tom,

Thanks very much for this. From my meeting notes today, the group also thought the following questions (in red below) would be EFED questions – I appreciate any feedback you may have on this before I touch base with Jan/Rose on EFED participation. Many thanks!

- How is this situation similar/different from regulating persistence as we have seen in grass clippings, mulch, manure, etc...?
  - Are we again looking to regulate beyond the user?
- With changes/improvements in seed coating technology is there an increase in residual presence?
  - If so, is this being considered by EPA?
- Does the EPA's risk assessments for pesticides used to treat seeds evaluate the potential risks from exposures to the pesticides from the plant or vegetation that grows from the seeds. If not, would EPA consider an evaluation of these potential risks, as they do for runoff, dusting, and consumption of unsown seed?
- If possible, having EPA provide a review of the process for the neonicotinoids approved for treating seeds from OPP-EFED as it relates to environmental exposure and pollinators would be beneficial.

Sandra O'Neill  
919 323 7926

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**From:** Steeger, Thomas <Steeger.Thomas@epa.gov>  
**Sent:** Tuesday, June 1, 2021 7:45 PM  
**To:** O'Neill, Sandra <ONeill.Sandra@epa.gov>  
**Cc:** Holmes, Jean <Holmes.Jean@epa.gov>  
**Subject:** RE: Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg

Sandra

Following through on today's meeting and with respect to the questions posted in the invite, the last question could be addressed by EFED (provided EFED management agrees). The last sentence though (highlighted in yellow) also pertains to EFED with respect to evaluating potential risks to pollinators from neonicotinoid-treated seed. EFED management would have to identify the appropriate staff member.

Tom Steeger

-----Original Appointment-----

**From:** O'Neill, Sandra <ONeill.Sandra@epa.gov>  
**Sent:** Tuesday, May 25, 2021 9:28 AM  
**To:** O'Neill, Sandra; Arrington, Linda; Friedman, Dana; Costello, Kevin; Sappington, Keith; Olinger, Christine; Huskey, Angela; Knorr, Michele; Bartow, Susan; Javier, Julie; Muhammad, Maryam K.; Gavin, Quinn; Colby, Deanna; Steeger, Thomas; Aranda, Amber; Swartz, Christina  
**Cc:** Hopkins, Yvette; Picone, Kaitlin; Emdur, Zoe; Koch, Erin  
**Subject:** Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg  
**When:** Tuesday, June 1, 2021 12:00 PM-1:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** Microsoft Teams Meeting

Greetings all,

The purpose of this meeting is to prepare for the Neonicotinoid Treated Seed Issues session at the Full SFIREG June 8 meeting. SFIREG's questions for this session are below. We want to make sure we have the right group of people to weigh in on the questions. Please feel free to forward to any that should be included.

SFIREG Questions for EPA:

- These neonicotinoid treated seeds are exempt from FIFRA regulations per 40 CFR 152.25(a) Treated Articles or Substances; what will it take to see the treated article determination changed?
- When does EPA anticipate finalizing the answers to the coated seed petition?
- How is this situation similar/different from regulating persistence as we have seen in grass clippings, mulch, manure, etc...?
- Are we again looking to regulate beyond the user?
- With changes/improvements in seed coating technology is there an increase in residual presence?
- If so, is this being considered by EPA?
- Were/are the seed treatment associations in contact with EPA?
- Regardless of whether they are considered treated articles under FIFRA, are treated seeds regulated under the Federal Seed Act?
- Does the EPA's risk assessments for pesticides used to treat seeds evaluate the potential risks from exposures to the pesticides from the plant or vegetation that grows from the seeds. If not, would EPA consider an evaluation of these potential risks, as they do for runoff, dusting, and consumption of unsown seed? With respect to ecological risk and pending EFED management input, EFED could provide a response.

If possible, having EPA provide a review of the process for the neonicotinoids approved for treating seeds from OPP-EFED as it relates to environmental exposure and pollinators would be beneficial.

Thanks and please let me know if you have any questions.

Best,  
Sandra O'Neill

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